

STATE OF INDIANA) MARION COUNTY _____ COURT
)
) SS:
 COUNTY OF MARION) CAUSE NO.

KELLY HAUSCHILD,)
)
 Plaintiff,)
 -vs-)
)
 KOHL’S DEPARTMENT STORES, INC.,)
)
 Defendant.)

COMPLAINT FOR DAMAGES

Comes now Plaintiff, Kelly Hauschild, by counsel, Martha McDermott, and for her Complaint for Damages against the Defendant, Kohl’s Department Stores, Inc., alleges and asserts as follows:

1. At all times relevant to this Complaint for Damages, Kelly Hauschild, was a resident of the County of Hamilton, State of Indiana.
2. At all times relevant to this Complaint, the Defendant Kohl’s Department Stores, Inc. was a business entity doing business and operating in the County of Marion, State of Indiana.
3. On or about January 25, 2019, Plaintiff, Kelly Hauschild, was a legal patron of Kohl’s Department Store, located at 8141 E. 96th Street, Indianapolis, Indiana 46256.
4. On or about January 25, 2019, the Defendant owned, operated, managed and/or maintained or had a duty to own, operate, manage and/or maintain, both individually and by and/or through its agents, servants and/or employees, the premises located at 8141 E. 96th Street, Indianapolis, Indiana 46256.

5. On or about January 25, 2019, Kelly Hauschild was walking from the parking lot to the entrance of Kohl's Department Stores, Inc. and slipped on a patch of ice, falling into and over the curb in front of the store and suffering a broken arm.
6. Kohl's Department Stores, Inc. had a duty to maintain the aforementioned premises, including said sidewalks and parking lots, in a reasonably safe condition for persons lawfully on said premises, to include the Plaintiff herein.
7. The Defendant failed to keep their premises safe for their patrons, including Kelly Hauschild.
8. As a direct and proximate result of the negligence of the Defendant, the Plaintiff suffered bodily injury, economic injury, pain and suffering, and mental and emotional upset.

WHEREFORE, Plaintiff prays that the Court enter judgment against the Defendant for compensatory damages, for consequential damages, for the cost of this action, and for all other relief, just and proper in the premises.

Respectfully submitted,

GARRISON LAW FIRM, LLC

/s/ Martha McDermott
Martha McDermott, #18800-49

REQUEST FOR TRIAL BY JURY

Comes now Plaintiff, by counsel, and hereby requests trial by a jury.

GARRISON LAW FIRM, LLC

/s/ Martha McDermott

Martha McDermott, #18800-49

GARRISON LAW FIRM
9795 Crosspoint Blvd.
Ste. 101
Indianapolis, IN 46256
Telephone: (317) 842-8283
Facsimile: (317) 841-6036